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November 2, 2023

Via ECF

Hon. Judge Arun Subramanian
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED.

SO ORDERED.


Arun Subramanian, U.S.D.J.
Date: November 3, 2023

Re: Pedro Paulino v. David Kleiner, et al
Index No.: 23-CV-05250 (AS)

Dear Honorable Judge Subramanian:

This office is co-counsel in our representation of the Defendants in the above referenced action. I am writing to respectfully request a brief one-week adjournment of the deadline to file Defendants' motion to compel arbitration. The current deadline is tomorrow, November 3rd.

On October 27, 2023, pursuant to Your Honor's Order dated October 25th (Dkt # 17), Defendants shared with Mr. Alex Granovsky, counsel for Plaintiff, documents which would be included in Defendants' anticipated motion. In recent days, including today, Plaintiff's counsel has raised certain issues which we are currently in the process of attempting to resolve with our clients and Plaintiff's counsel. Accordingly, we respectfully request a one-week extension of time for Defendants to file the motion to compel arbitration, while we work to potentially resolve these issues. Defendants are aware that Your Honor's Individual Rules require that all extension requests be submitted at least two business days prior to the deadline. However, certain pertinent information regarding this matter just came to our attention this afternoon. Defendants have filed the present motion for an extension as promptly as possible.

This is the first request for an extension. Plaintiff's counsel consents to this request. Should the court grant this request, the parties request that the following revised briefing schedule be implemented:

<u>Defendants' Motion</u>	<u>November 10, 2023</u>
<u>Plaintiff's Opposition</u>	<u>November 17, 2023</u>
<u>Defendants' Reply</u>	<u>November 24, 2023</u>

Should the Court grant this request, aside from the above briefing schedule, no other deadlines or appearances would be affected.

Thank you for your time and consideration regarding this matter.

Very truly yours,

/S/
Joshua Beldner

CC: VIA ECF
Counsel for all parties